

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HAI DONG LI,)	
)	
Plaintiff)	
)	CASE NO. 19-cv-11629
v.)	
)	
ALIBABA GROUP HOLDING LTD,)	JUDGE: Vernon S. Broderick
AND)	
JOHN DOES and MARY ROES,)	
)	MOTION TO AMEND
Defendants.)	
)	
-----x		

TO THE HONORABLE JUDGE OF SAID COURT:

I, Hai Dong Li, acting pro se, seek the Court's approval to amend Document 40, filed on October 16, 2023. This motion aligns with Rule 15 of the Federal Rules of Civil Procedure, which permits amendments for justice's sake.

Basis for Amendment:

- **Rule 15(a)(2):** Encourages flexibility in granting amendments to correct errors and uphold justice.
- **Rule 15(b):** Supports amending filings to address unpleaded issues that emerge during proceedings, ensuring decisions are based on the substance of the case.
- This motion also relies on the Court's duty to facilitate a fair and orderly legal process.

REASONS FOR AMENDMENT:

1. On October 16, 2023, I inadvertently included three separate documents within

Document 40, pages 1-32: a NOTICE OF MOTION, a DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION TO RECONSIDER JUDGMENT, and a standalone DECLARATION. This unintentional submission resulted in duplicative and unnecessary filings that may cause confusion and fail to adhere to the Court's procedural and formatting standards.

2. The correct submission should only include a NOTICE OF MOTION and a DECLARATION, reflecting my arguments and the basis for the requested relief.
3. This motion to amend is made in good faith, with no intent to delay but to ensure clarity and compliance with the Court's protocols.

WHEREFORE, I, Hai Dong Li, respectfully request that this Honorable Court:

- A.** Grant this motion to amend;
- B.** Authorize the filing of an amended NOTICE OF MOTION (as Attachment A) and AFFIDAVIT (as Attachment B);
- C.** Order the replacement of the previously filed Document 40, pages 1-32, with the corrected documents;
- D.** Grant any further relief deemed just and proper by the Court.

I believe these amendments will promote judicial efficiency and serve justice by providing a clear and precise record, thus aligning with the Federal Rules of Civil Procedure's intent to decide cases on their merits rather than procedural errors.

Dated: November 23, 2023
New York, N Y

A handwritten signature in dark ink, appearing to read 'Hai Dong Li', is written above a horizontal line.

/s/ Hai Dong Li
Plaintiff Pro Se
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